Danner, Ward

From: Jennifer DENICOLA <jd18@me.com>
Sent: Sunday, January 12, 2014 1:56 PM
To: Wilson, Patrick
Subject: Important Questions to be answered about exposure guidelines

Dear Patrick:

Thank you for sending this information, but I do not feel using this non-authored, draft that states, "do not cite or quote" as the evaluation criteria for Malibu High School is appropriate.

Here are my questions:

1. Who is the name, and contact information, of your counterpart in Region 2, who wrote the draft document 4/28/09

2. Will you send me a signed and dated copy of the document on EPA letterhead to verify it is EPA approved.

3. what does "Draft...Do Not Cite or Quote" mean on the 4/28/09 document?

4. "A health-based exposure guideline of .2 ug/m3 was selected to protect students at P.S. 199 from long-term exposures to PCBs in indoor air"
Who selected this and how did they determine that this new number, different from all other EPA levels is appropriate? Who gets to decide this ? Who at EPA is the policy decision maker that approves this decision?

5. Where are the even pages that go with this draft 4/28/09 (only the odd pages are attached)?

6. Based on my limited knowledge, the exposure parameters (pg 3) that were done for students does not reflect the exposure parameters in Malibu.

7. pg 7 "PCB's are classified by IRIS as probable human carcinogens based on..." This statement is no longer valid. Since this is a premise of this draft, then their conclusions would also be highly suspect.

8. pg 7 "that all exposure population would incur less than 1 in 100,000 excess lifetime cancer risk..." This exposure parameter is not EPAs 1 in 1 million risk starting place. This risk analysis started at the middle of the road in your risk range. This is unacceptable. Why wouldn't you do a MHS risk assessment based on accurate parameters for our school based on the 1 in 1 million cancer risk and use that as our target?

9. pg 7, Is this exposure parameter based on the most toxic of PCBs like Aroclor 1254 or Aroclor 1016? 1254 RfD being a factor of 3x more stringent than 1016 RfD.

10. pg 9, "it is relevant to note that dermal and ocular effects, including skin irritation, chloracne, hyper-pigmentation and eyelid and conjunctival irritation, have been observed in humans occupationally exposed to Aroclor 1254 and other Aroclor formulations." No questions, just pointing this out.

11. pg 9, "However, the recommended exposure guideline developed for students would be sufficiently protective of adults workers as well" These calculations were done by Phlymor Group during the Nov 2013

testing and the "resulting cancer screening levels for school staff and students are 20.2 ng/m3 and 63.7 ng/m3, respectively. The lower of these screening levels (20.2ng/m3) will be used to guide further action following the indoor air testing." This document was handed out to the task force on Nov 14th, 2013. Why wouldn't we use the specific calculations made for Malibu High? Why would you use .2ug/m3 from another schools analysis, that is a draft from 5 years ago, for our school when we do not have the same exposure parameters?

Time is of the essence. Please provide in writing, detailed answers to these questions before the EPA uses this evaluation criteria for Malibu High School. Using this criteria would be highly suspect considering the age of this document, the lack of authorship, and the lack of EPA policy approval for the assumptions made to reach this number.

I anxiously await your reply.

Thank you,

Jennifer deNicola

On Jan 9, 2014, at 12:38 PM, Wilson, Patrick <Wilson.Patrick@epa.gov> wrote:

http://www.cleanairinfo.com/energyefficiencytraining/files/nj/2_Mark%20Maddaloni/2%20EPA%20School%20PCBs.pdf

Good Morning Ms. DeNicola (Jennifer),

Thank you for your message - I very much appreciate your patience during our conversation last evening. I wanted to provide a couple of pieces of information to you that I hope is responsive to your request:

1. I've attached a pdf copy (it may be upside down & need to be printed) of a memo prepared by my counterpart in EPA's Region II office in New York which details the derivation & formal recommendation associated with the 0.2 ug/m3 guideline considered protective for airborne PCBs exposures in schools. The memo details the toxicity criteria & exposure assumptions used to arrive at this health-based concentration - which is considered protective for all receptors at the school.

The paragraph with the specific recommendation & health-based concentration can be found on pg.10 of this memo.

2. I am also attaching a link to a powerpoint presentation that my colleague has used in various settings to capture some of the science & analysis supporting the Agency's guidelines. I would like to specifically direct your attention to some of the information captured in slide #5 - which provides some limited data from rooms sampled with differing configurations with respect to ventilation system dynamics (windows & systems).

We hope that you find this information useful Jennifer.

Best Regards...

-----Original Message-----
From: Jennifer deNicola [mailto:jd18@me.com]
Sent: Wednesday, January 08, 2014 11:30 PM
To: Wilson, Patrick
Subject: please send me the .2 for schools document

Dear Patrick,

Thank you for returning my call and for listening. This is such a frustrating experience. I understand that risk assessment is not cut and dry but it is also too flexible. People's lives and the risk associated with toxins is not flexible. To me it is very cut and dry. The less risk that we can expose people to the better it is and that should be our goal.

I understand that your goals are set by congress but this should not be. Since we cannot change that, we can let that rest.

Please keep in mind that PCBs are 1 toxin in a list of toxins found on our school grounds. Whether a particular toxin is causing harm or the mixture of these toxins together is causing harm, we must test the entire campus to ensure all of it is healthy for our kids and our teachers. Until all toxins are tested, no one can scientifically assure us that it is safe.

Please send me the school screening level that you told me about that is .2ug/m3. But understand that the screening level should be at the safest level of .0043 ug/m3 (yes I am using your factors) that is written in your regional screening level table.

Kids should always have the safest protection under the law, which means the safest protection by the EPA. They are our future and in America, our job is to always protect them.

Sincerely,
Jennifer deNicola

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